I am against this proposal as tuning across the amateur radio phone sub-bands often shows very much wide open space available for use. The current novice subbands offer the amateur radio telegraph operator additional interference free space to operate, without the wide range of digital communication interference common on the lower band edges. The current CW subbands are prone to heavy interference from amateur radio operators outside the U.S. using SSB transmissions. The Novice sub bands also offer the slower speed operator space to improve his/her CW skills. I would please urge you to not change the current subbands for these reasons as the CW mode is very much in use.